

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CAMBRIA COMPANY LLC,

Plaintiff,

Case No. 1:20-cv-00508 (PLM/PJG)

vs.

Hon. Paul L. Maloney

LAKESIDE SURFACES, INC.,

Defendant.

_____ /

STIPULATION TO MODIFY AMENDED CASE MANAGEMENT ORDER

WHEREAS Plaintiff Cambria Company LLC (“Cambria”) and Defendant Lakeside Surfaces, Inc. (“Lakeside”) (collectively, “the parties”) have proceeded with fact discovery, including written discovery, document productions, and third-party discovery, and are now prepared to proceed with depositions of fact witnesses;

WHEREAS the parties have recently reengaged in substantial discussions regarding settlement; and

WHEREAS the parties wish to conserve the resources and time of the Court and fact witnesses alike in the event settlement is reached; therefore,

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Cambria and Lakeside, subject to the approval of the Court, that the following deadlines in the Amended and Modified Case Management Order (Dkt. Nos. 27 and 32) be further modified as follows:

1. The Discovery Deadline be extended from the current deadline of October 29, 2021 to December 3, 2021;

2. The deadline for Disclosure of Expert Reports (Rule 26(a)(2)(B)) by the party with burden of proof be extended from the current deadline of November 10, 2021 to December 15, 2021;

3. The deadline for Disclosure of Expert Reports (Rule 26(a)(2)(B)) by the party without burden of proof be extended from the current deadline of December 1, 2021 to January 14, 2022;

4. The deadline for Expert Depositions be extended from the current deadline of December 17, 2021 to January 31, 2022; and

5. The deadline for Dispositive Motions be extended from the current deadline of January 18, 2022 to February 25, 2022.

No other deadlines in the Amended and Modified Case Management Order are impacted by this stipulation, including the Settlement Conference of July 26, 2022, the Final Pretrial Conference of August 8, 2022, or the trial scheduled to begin August 29, 2022.

PRICE HENEVELD LLP

s/ Gregory A. Lewis
Gregory A. Lewis (P75796)
Matthew J. Gipson (P60169)
695 Kenmoor Ave. S.E., P.O. Box 2567
Grand Rapids, MI 49546-2567
Tel: 616-949-0610
glewis@priceheneveld.com
mgipson@priceheneveld.com

Of Counsel:

John C. Adkisson
FISH & RICHARDSON P.C.
3200 RBC Plaza, 60 South 6th Street
Minneapolis, MN 55402
Tel: 612-335-5070
adkisson@fr.com

*Attorneys for Plaintiff Cambria Company
LLC*

GARAN LUCOW MILLER, P.C.

s/ Robert D. Goldstein (with permission)
Robert D. Goldstein (P38298)
John W. Whitman (P37932)
10801 South Saginaw Street, Building D
Grand Blanc, MI 48439
Tel: 810-695-3700
rgoldstein@garanlucow.com
jwhitman@garanlucow.com

*Attorneys for Defendant Lakeside Surfaces,
Inc.*

Dated: October 21, 2021

IT IS SO ORDERED this ____ day of _____, 2021.

The Honorable Paul L. Maloney
United States District Judge